

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF RHODE ISLAND**

<b>SHANNAH M. KURLAND,</b>	:	
<b>Plaintiff</b>	:	
	:	
v.	:	<b>C.A. No. 18-cv-00440-MSM-LDA</b>
	:	
<b>CITY OF PROVIDENCE, by and</b>	:	
<b>through its Treasurer, James J.</b>	:	
<b>Lombardi, III, GEORGE SMITH alias,</b>	:	
<b>RALPH ABENANTE, alias, and</b>	:	
<b>KYLE RICHARDS, alias,</b>	:	
<b>individually and in their official</b>	:	
<b>capacities as police officers in the</b>	:	
<b>City of Providence Police Department,</b>	:	
<b>and HUGH T. CLEMENTS, JR., alias,</b>	:	
<b>individually and in his official capacity as</b>	:	
<b>Chief of the City of Providence Police</b>	:	
<b>Department, and STEVEN M. PARÉ,</b>	:	
<b>alias, individually and in his official</b>	:	
<b>capacity as Commissioner of Public</b>	:	
<b>Safety for the City of Providence,</b>	:	
<b>Defendants</b>		

**JOINT MOTION TO AMEND SCHEDULED ORDER**

The Parties in the above captioned matter hereby move to amend the scheduling order by extending the deadline for filing dispositive motions by one (1) month up to and including March 13, 2023. This is the Parties' first motion to extend the dispositive motion deadline.

The Parties aver that additional time is required to prepare motions because of personal and professional obligations in other matters, including, but not limited to, dispositive motions due to this Court by Plaintiff's counsel in complex prison litigation less than a week prior to the pending dispositive motion deadline. Plaintiff and Defendants believe that the additional time requested is necessary to adequately prepare meaningful and well-drafted dispositive motions that are likely to simplify the issues in this matter for trial. As such, the parties respectfully request that this motion be granted.

**Respectfully submitted by,**

Plaintiff,  
By her attorneys,

**Date: January 20, 2023**

**/s/ Richard A. Sinapi**

**Richard A. Sinapi, Esq. (#2977)**

**Chloe A. Davis, Esq. (#9334)**

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Defendants,  
By their attorneys,

**/s/ Jillian Barker**

**Jillian H. Barker, Esq. (#8353)**

**Senior Assistant City Solicitor**

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**s/ Michael J. Colucci**

**Michael J. Colucci Esq. (#3302)**

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**CERTIFICATION**

**I hereby certify that on January 20, 2023, a true copy of the within was filed electronically via the Court's CM/ECF System. Notice of this filing will be sent by e-mail to all parties by operation of the Court's electronic filing system and the filing is available for viewing and downloading from the court's cm/ecf system. Service on the counsel of record has been effectuated by electronic means.**

**/s/ Richard A. Sinapi**